

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES INVESTOR PROTECTION	:
CORPORATION,	:
Plaintiff-Applicant,	:
	:
-against-	:
	:
BENARD L. MADOFF INVESTMENT	:
SECURITIES LLC,	:
Defendant.	:
-----X	
In re:	:
	:
BERNARD L. MADOFF,	:
	:
Debtor.	:
-----X	
IRVING H. PICARD, Trustee for the Liquidation of:	:
Bernard L. Madoff Investment Securities LLC,	:
	:
Plaintiff,	:
	:
-against-	:
	:
Banque Privee Espirito Santo S.A., f/k/a	:
Compagnie Bancaire Espirito Santo SA,	:
	:
Defendant.	:
-----X	

**DECLARATION OF JOHN F. ZULACK IN SUPPORT
OF MOTION TO WITHDRAW AS COUNSEL**

JOHN F. ZULACK hereby declares, under penalty of perjury pursuant to 28

U.S.C. § 1746, as follows:

1. I am a partner of Allegaert Berger & Vogel, LLP, counsel of record for Defendant Banque Privee Espirito Santo SA f/k/a Compagnie Bancaire Espirito Santo SA (the “Defendant”) in the above-captioned adversary proceedings.

2. I submit this Declaration in support of the motion of Allegaert Berger & Vogel LLP, for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Allegaert Berger & Vogel LLP to withdraw as counsel to Defendant; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the contents of this declaration are based on my personal knowledge.

3. Banque Privée Espirito Santo S.A. was declared bankrupt on September 19, 2014 by a decision of the Swiss Financial Market Supervisory Authority (FINMA) and the Defendant is currently in liquidation in Switzerland.

4. Differences have arisen between Allegaert Berger & Vogel LLP and the Defendant which make it impossible for Allegaert Berger & Vogel LLP to continue to represent the Defendant.

5. The Defendant will not be prejudiced should the instant application be granted.¹

6. Allegaert Berger & Vogel LLP has no charging lien.

7. No undue delay or prejudice to any party will result from the firm's withdrawal as counsel for the Defendant.

8. Accordingly, cause exists to grant the application authorizing Allegaert Berger & Vogel LLP to withdraw as counsel for the Defendant.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 12, 2020

s/John F. Zulack

John F. Zulack

¹ All of Defendant's jurisdictional, substantive and procedural rights and remedies in connection with the above-captioned cases are hereby expressly reserved.